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Amy, Erika, Tori, Jenny, and Jessica

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

“AMY,” “ERIKA,” JANE SMITH as next of
friend for “TORI” minor, “JENNY,”
“JESSICA,” “LILY,” “SARAH,” JANE DOE
as court appointed conservator for “SKYLAR”
and “SAVANNAH” minors, JOHN DOE as
court appointed conservator for “SALLY” and
“SIERRA” minors, “MAUREEN,” WILLIAM
L.E. DUSSAULT as Guardian ad Litem for
“VIOLET” minor, and JANE ROE as next
friend for “PIA,” and “MYA,”

NO. 19 CV 2184 PJH

DECLARATION OF CAROL L. HEPBURN
IN SUPPORT OF RESPONSE TO
DEFENDANT’S MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM ON
WHICH RELIEF CAN BE GRANTED

NOTE ON MOTION CALENDAR:
Date: August 28, 2019

DECLARATION OF CAROL L. HEPBURN IN
SUPPORT OF RESPONSE TO DEFENDANT’S
MOTION TO DISMISS- 1

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

Time: 9:00 a.m.
Judge: Honorable Phyllis J. Hamilton
Chief United States District Judge

CAROL L. HEPBURN hereby declares the following to be true and correct under the laws of the State of Washington:

1. I am an attorney licensed to practice law in the States of Washington and Oregon.
2. I represent the Plaintiffs herein. I make this Declaration in support of Response To Defendant's Motion To Dismiss For Failure To State A Claim On Which Relief Can Be Granted.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Transcript of Proceedings of guilty plea hearing in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, No. 3:16-cr-00510-SI.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Victim Notification System notification which I received on behalf of the victims Lily, Sarah, Sierra, Skylar, Violet, Sally, Ashlyn, Pia, Mya and Ava from the United States Department of Justice regarding Randall Steven Curtis. Their legal names are redacted to preserve their anonymity.

DECLARATION OF CAROL L. HEPBURN IN
SUPPORT OF RESPONSE TO DEFENDANT'S
MOTION TO DISMISS- 2

5. Attached hereto as Exhibit 3 is a true and correct copy of the July 6, 2018 Stipulation Regarding Restitution to Claimants Other Than “CC” filed at ECF 90 in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, No. 3:16-cr-00510-SI.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Amended Judgment filed at ECF 114 in *United States v. Randall Steven Curtis*, United States District Court, Northern District of California, No. 3:16-cr-00510-SI.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Amy, Vicky and Andy Child Pornography Victim Assistance Act of 2018, as retrieved from congress.gov today.

DATED this 5th day of August, 2019 at Seattle, WA.

s/Carol L. Hepburn
CAROL L. HEPBURN